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March 28, 2025

VIA ECF

The Honorable Karen M. Williams
United States District Court of New Jersey
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Niv, et al v. Federal National Mortgage Association,

US District Court of New Jersey, 1:25-cv-01570 Request for Adjournment Under Local Rule 7.1

Dear Judge Williams:

This firm represents Plaintiffs Ayala and Moshe Niv in the above-referenced matter. Defendant Fannie Mae filed a Motion to Dismiss, and the current motion day is April 21, 2025. I am lead counsel in a jury trial beginning on Monday, March 31, and it is expected to last nearly two weeks. I am then traveling the week of April 14 for a prepaid family vacation during Passover. To provide adequate time to respond to the motion, I request a two-cycle adjournment of the motion day. The originally noticed motion day has not previously been extended or adjourned. The new motion day would then be May 19, 2025.

I conferred with Defendant's counsel, who consents to this request. Thank you for the Court's attention to this matter.

Respectfully,

Jason A. Levine

JAL/ht